

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BOB WINCEK, a Wisconsin citizen,
and IRINA IVANOVA-WINCEK, a
Wisconsin citizen.

Plaintiffs,

V.

ARTHUR V. VEAL, IV, an Illinois citizen, CHICAGO TITLE AND TRUST COMPANY, not individually but as Trustee of the Land Trust dated 11/1/06 and known by Trust No. 8002348216, an Illinois land trust, WE BUY HOUSES HOME SERVICES, LLC, an Illinois Limited Liability Corporation, and TRUE NUMBERS LLC, an Illinois Limited Liability Corporation,

Defendants.

Case Number: 1:20-cv-03296

Judge: Honorable Franklin U. Valderrama

Magistrate Judge: Susan E. Cox

PLAINTIFFS' MOTION FOR ENTRY OF JUDGMENT

NOW COME Plaintiffs, BOB WINCEK and IRINA IVANOVA-WINCEK (collectively, “Plaintiffs” or the “Winceks”), by their attorneys, Weissberg and Associates, Ltd., and as *Plaintiffs’ Motion for Entry of Judgment*, state as follows:

1. On November 21, 2023, at 10:00 a.m., Plaintiffs filed their Motion to Reinstate Case and Enforce Settlement Agreement (“Motion to Enforce”). See, Motion to Enforce attached hereto as **Exhibit 1**.
2. On January 23, 2023, this Court granted the Motion to Enforce and set a briefing schedule for Plaintiffs to submit a fee petition by February 7, 2023, and for Defendants to object to the prove-up affidavit by February 14, 2023. See, Order attached hereto as **Exhibit 2**.
3. Plaintiffs filed their Fee Petition on February 7, 2023. See, Fee Petition attached

hereto as **Exhibit 3**.

4. Defendants never objected to the Fee Petition.

5. Final judgment was never entered by the Court pursuant to the unopposed Fee Petition, and significant time has elapsed since the submission of the Fee Petition, and Plaintiffs have reason to believe Defendants are dissipating assets much to Plaintiffs prejudice.

6. Accordingly, Plaintiffs request a final judgment in the amount of \$426,445.17, comprising of the \$380,362.42 this Court granted when it enforced the Settlement Agreement, plus the \$46,082.75 from the unopposed Fee Petition.

WHEREFORE, Plaintiffs, BOB WINCEK and IRINA IVANOVA-WINCEK, pray that this Court enter final judgment in Plaintiffs' favor and against Arthur V. Veal, IV individually and Chicago Title Land Trust Company, as Trustee of the Land Trust dated 11/1//06 and known as Trust No. 8002348216, We Buy Houses Homes Services, LLC , and True Numbers, LLC, jointly and severally, in the amount of \$426,445.17; and for such other and further relief as this Court deems just and proper in Plaintiffs' favor.

**BOB WINCEK and IRINA
IVANOVA-WINCEK, Plaintiffs**

By: /s/ Rakesh Khanna
One of their attorneys

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CERTIFICATE OF SERVICE

I, Rakesh Khanna, certify that on July 28, 2023, I caused to be filed ***Plaintiffs' Motion for Entry of Judgment***. Notice of this filing was sent to all parties registered to receive notice in this case by electronic transmission through the court's CM/ECF system, including to the following parties:

Anthony D. Andrews, Esq.

Law Firm of Anthony D. Andrews, PC

18027 Harwood Ave.-Upper Level

Homewood, Illinois 60430

Email: Tdrews34@yahoo.com

(on behalf of Arthur V. Veal, IV, Chicago Title and Trust Company-Trust No. 8002348216, We Buy Houses Home Services, LLC and True Numbers, LLC)

Rakesh Khanna

Rakesh Khanna